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Attorneys for Defendant  
Recover Innovations, Inc. d/b/a Recover Tactical

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

\* \* \*

CAA Industries, Ltd.,

Plaintiff,

v.

Recover Innovations, Inc. d/b/a Recover  
Tactical,  
Defendant.

Case No. 2:22-cv-00581

**UNOPPOSED MOTION TO EXTEND  
DEADLINE FOR (I) PLAINTIFF TO  
RESPOND TO DEFENDANT'S  
MOTION TO DISMISS AND (II)  
DEFENDANT TO REPLY TO  
DEFENDANT'S RESPONSE**

**(FIRST REQUEST)**

Defendant Recover Innovations, Inc. d/b/a Recover Tactical, by and through undersigned counsel and with no opposition from Plaintiff CAA Industries, Ltd., hereby respectfully requests that the Court grant Plaintiff an extension of one (1) week to respond to the pending Motion to Dismiss filed on July 7, 2023 (Doc. 54). Pursuant to LR IA 6-1, this is the first request for extension of time.

Currently, Plaintiff's response to the Motion to Dismiss is due July 21, 2023, with Defendant's reply due July 28, 2023. Defendant's counsel has a pre-planned, pre-paid family vacation planned nine months ago from July 23-30, 2023. To accommodate this, Defendant has requested that Plaintiff agree to a one-week extension of time for Plaintiff to respond to the Motion

1 to Dismiss so that the reply due date does not fall during this brief vacation time. With such an  
2 extension, the response would be due July 28, 2023, and the reply due August 4, 2023. In email  
3 correspondence between the parties on July, 21, 2023, Plaintiff's counsel agreed to this proposal.  
4 This short request is sought in good faith and not pursued for undue delay. No further extensions  
5 will be sought.

6 For the foregoing reasons, Defendant respectfully requests the Court grant this Motion.

7 Respectfully Submitted this 21<sup>st</sup> day of July, 2023.

8 Sherman Law, PLLC

9 By: /s/Kenneth M. Motlenich-Salas

10 Shlomo S. Sherman, Esq.

11 Nevada Bar No. 009688

12 2620 Regatta Drive, Suite 102

13 Las Vegas, Nevada 89128

14 and

15 Kenneth M. Motolenich-Salas (AZ Bar No. 027499 (*pro hac*  
16 *vice*))

17 Of Counsel to Weiss and Moy, P.C.

18 MotoSalas Law, PLLC

19 16210 North 63rd Street

20 Scottsdale, Arizona 85254

21 Attorneys for Defendant Recover Innovations, Inc.

22 IT IS SO ORDERED:

23   
UNITED STATES DISTRICT JUDGE

24 DATED: July 21, 2023

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**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of MotoSalas Law, PLLC and that on the 21<sup>st</sup> day of July, 2023, pursuant to Fed. R. Civ. P. 5, LR 5-1 and LR IC 4-1, I caused to be served a true and correct copy of foregoing **UNOPPOSED MOTION TO EXTEND DEADLINE FOR (I) PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION TO DISMISS AND (II) DEFENDANT TO REPLY TO DEFENDANT'S RESPONSE** in the following manner:

(ELECTRONIC SERVICE) The above-referenced document was electronically served on the date hereof through the Notice of Electronic Filing automatically generated by the Court's facilities to those parties listed on the Court's Master Service List.

By: /s/ Kenneth M. Motolenich-Salas  
Attorney of Record for Defendant and Employee of  
MotoSalas Law, PLLC

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